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CHEMICAL LAND HOLDINGS, INC.

November 22, 2000

U.S. Environmental Protection Agency, Region II
Emergency and Remedial Response Division
290 Broadway, 19th Floor, Room W-20
New York, NY 10007-1866

Attention: Ms. Janet Conetta
Strategic Integration Manager

Subject: Response to Comments Prepared by PVSC
November 8, 2000
Passaic River Study Area – CSO Trial Run Recommendation Report
Administrative Order on Consent Index No. II-CERCLA-0117

Dear Ms. Conetta:

Please find enclosed CLH's response to the Passaic Valley Sewage Commissioners' (PVSC's) comments dated November 8, 2000. These comments were prepared by PVSC's technical advisors in response to CLH's CSO Trial Run Recommendation Report, which was submitted to EPA on June 23, 2000. The format of the document is to present the PVSC's comment in **bold**, and CLH's response in *italics*.

The PVSC raise a number of concerns that they characterize as "serious" and CLH agrees with some of these issues. CLH identified specific concerns in its evaluation of the field test results and modifications to correct these problems have been developed. As a result of the specific problem of high moisture content of the filtered CSO sediments, CLH conducted a comparison test between a field centrifuge and the filtration procedure specified in the Ecological Sampling Plan (ESP). The results of this comparison were submitted to EPA on September 20, 2000 with a request for Agency approval of the method. The demonstration showed that centrifugation produced a sediment sample with much lower moisture content than filtration. It is apparent from PVSC's comments that they did not have this document to review.

CLH has prepared the attached response to comments to address PVSC's concerns. Therefore, to save time, we are copying this letter and the responses directly to PVSC.

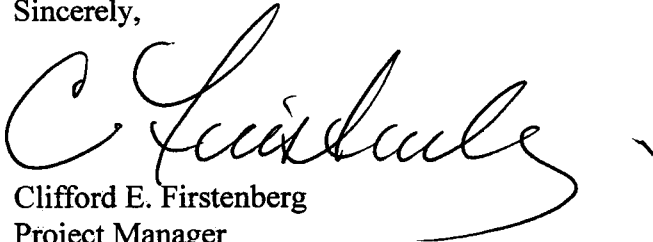
CLH had already begun preparing revised sections of the ESP related to CSO sampling when PVSC's comments were received. Therefore, we will finalize revision of those sections, taking into consideration PVSC's comments, and plan to submit the revised sections to the Agency during the last week of November.



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CLH is in complete agreement with PVSC regarding the need for a meeting, as indicated in CLH's Trial Run Recommendation Report transmittal letter dated June 23, 2000. Therefore, we have begun coordinating the date of this meeting with Ms. Sharon Jaffess, and hope to be able to meet early in December 2000.

Sincerely,



Clifford E. Firstenberg
Project Manager
On behalf of Occidental Chemical Corporation
(as successor to Diamond Shamrock Chemicals Company)

enclosure

(2 copies sent)

Copy to:

R. Romagnoli (BBL)
D. Waldschmidt (EDS)
L.A. Wolfskill (L.A. Wolfskill Engineering)
S. Lipke (PVSC)

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- 2c: Section Chief
NJDEP-Bureau of Federal Case Management
401 East State Street - CN 028
Trenton, NJ 08625-0028
Attn: Jonathan D. Berg
- 1c: Chief, New Jersey Superfund Branch
Office of Regional Counsel
U.S. Environmental Protection Agency
290 Broadway, 19th Floor, Room W-20
New York, NY 10007-1866
Attention: Diamond Alkali Site Attorney - Passaic River Study Area